

From: [Chen, Isaac](#)
To: [Wilson, Scott](#); [Larsen, Brent](#)
Subject: RE: Issues that came out of a conference this week
Date: Friday, January 16, 2015 2:05:00 PM

Scott,

Thanks. If you have email addresses for those groups, please send to me. Or, you may give my email to them. I plan to start working on the renewal this fall.

Isaac

From: Wilson, Scott
Sent: Friday, January 16, 2015 12:38 PM
To: Chen, Isaac; Larsen, Brent
Subject: Issues that came out of a conference this week

Brent/Isaac:

I attended the annual Produced Water Society conference this week and a couple of things were mentioned to me that I thought you may want to consider during the next OCS permit reissuance.

The main one was that operators in deepwater are starting to desalinate seawater for use in water flooding. These processes can discharge 2 MGD or more of reject water. While desalination reject water was considered under the OCS general permit and is listed as a miscellaneous discharge, that was as a much smaller waste stream resulting from desalination of seawater for use in drinking and domestic water systems on the platform. These reverse osmosis wastewaters are heavily chemically treated to prevent fouling and to clean the membranes.

The other issues was concerning the groups that are brought in to discuss permit conditions and who receive information regarding draft permits. There seems to be some feeling that the EPA mostly only communicates with the Offshore Operators Committee (OOC) and leaves out other groups such as the International Association of Drilling Contractors and the Independent Producers Association. The issues seems to be that the OOC really is only made up of the Majors and doesn't represent many smaller companies and rig owners. Their point was probably good and it seems to make sense to try to hit a broader audience during the next permit reissuance.

Let me know if you have questions or want any help with these issues when you are working on them.

Scott